

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ABSOLUTE RESOLUTIONS INVESTMENTS,  
LLC,

Case No. 1:22-cv-02079-MMG

Plaintiff/Counterclaim Defendant,

-against-

CITIBANK, N.A.,

Defendant/Counterclaim Plaintiff.  
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STIPULATED  
PROTECTIVE ORDER  
AS TO DOCUMENTS  
PRODUCED BY NON-PARTY  
CAVALRY PORTFOLIO  
SERVICES LLC

On April 29, 2025, the Court entered a text order (the “Order”) (Doc. 106) compelling non-party Cavalry Portfolio Services LLC (“Cavalry”) “to produce” to Plaintiff/Counterclaim Defendant Absolute Resolutions Investments, LLC (“Absolute”) “a document” “reflecting the amount recovered by Cavalry on the accounts at issue, provided Cavalry can identify with reasonable certainty the relevant accounts on its systems, and conditioned on an agreement regarding acceptable limitations on the distribution and use of such documents once produced”, (hereinafter the “Document”).

This Stipulation is made to memorialize Cavalry’s, Absolute’s and Defendant/Counterclaim Plaintiff Citibank, N.A.’s (“Citibank”) “agreement regarding acceptable limitations on the distribution and use” of the Documents to be produced pursuant to the Order.

1. The Document and the information contained therein produced by Cavalry pursuant to the Order are designated as “Attorney’s Eyes Only” and will be marked as such by Cavalry.
2. The Document and the information contained therein shall not be distributed or disclosed to any person other than (a) counsel retained specifically for this action, including any paralegal, clerical and other assistant employed by such counsel and assigned to this matter; and (b) any person retained by a party to serve as an expert witness or otherwise provide specialized advice to counsel in connection with this action, provided such person has first executed a Non-Disclosure Agreement in the form annexed as Exhibit A hereto. An executed Non-Disclosure Agreement shall be provided to Cavalry Portfolio Services, LLC, fourteen (14) days prior to the distribution or disclosure of the Document to such person.
3. Any document(s) created or specialized advice provided in relation to the disclosure of the Document and the information contained therein as anticipated by paragraph 2 shall not be distributed or disclosed to any person other than those identified in paragraph 2.

4. The Document and the information contained therein shall not be used in any manner other than as contemplated in paragraph 3 above.
5. Any further discovery sought from Cavalry shall be pursuant to a subpoena as governed by the Federal Rules of Civil Procedure. This stipulation shall not be interpreted to act as a waiver of Cavalry's rights to oppose further discovery requests.

**SO STIPULATED AND AGREED.**

/s/Shannon Miller

Shannon Miller

Counsel for Cavalry Portfolio Services, LLC

Dated: July 2, 2025

/s/Yonaton Aronoff

Yonaton Aronoff

Counsel for Plaintiff

Dated: July 2, 2025

/s/Phoebe Winder

Phoebe Winder

Counsel for Defendant

Dated: July 2, 2025

SO ORDERED. Dated July 11, 2025.



HON. MARGARET M. GARNETT  
UNITED STATES DISTRICT JUDGE